

UCC Institute Facility - Agency/UCC Collaboration Meeting

Erich Weissbart/USEPA
Kenan Cetin/WVDEP
Jerome Cibrik/UCC
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PREPARED BY: CH2M, June 8, 2017

MEETING DATES: May 30 and 31, 2017

1. Cleanup Standards

- a. USEPA and WVDEP did not feel that there was a need for a letter from WVDEP endorsing the remedial action objectives (RAOs) like the letter provided for the South Charleston Facility.
- b. USEPA and WVDEP are in general agreement with the standards proposed; specifically, that remediation areas will cleanup to asymptotic or MCL/RSL and then utilize natural attenuation. It is understood that this may leave some elevated groundwater concentrations that will degrade over time.
- c. MCLs/RSRs will be established as the goals for groundwater at the facility, though it is understood that this will be accomplished over time.

2. Groundwater Performance Monitoring Program (PMP)

- a. PMP approach is acceptable to USEPA and WVDEP.
- b. USEPA would like to see the remediation area groundwater monitoring results included as an attachment or amendment including development of plume maps for these remediation areas.

3. Tank 1010

- a. Need to include more technical discussion to support the breakdown of benzene between the groundwater monitoring wells and the pore water sample locations.
- b. Collect another round of pore water sampling to support the results from the round conducted in 2012.
- c. Establish a criterion for action in the perimeter monitoring wells downgradient of Tank 1010; likely a statistical evaluation that would trigger further evaluation if increasing concentration trends observed.
- d. Will complete a Technical Impracticability determination for soil with natural attenuation for groundwater.
- e. Determine how to best evaluate perimeter wells in the Performance Monitoring Plan (PMP) in cases where a remedy has been completed and receptors are protected, but groundwater concentrations do not yet meet the performance standard. This would apply to the Tank 1010

downgradient perimeter wells where the pore water criteria are exceeded in the well, but not in pore water.

4. High Purity Hydrocarbon (HPH) Area

- a. USEPA and WVDEP agree that the HPH system can be shut down to monitor concentration rebound and to develop a contingency plan to address potential statistically relevant concentration rebound.

5. Wastewater Treatment Unit (WWTU)

- a. Provide USEPA copies of documents previously submitted for WWTU including justification for no longer pumping at WWTU from two recovery wells; if approved, then recovery wells can be abandoned.

6. West Virginia State University (WVSU)

- a. Documents that have been submitted to USEPA/WVDEP have been approved and endorsed by USEPA, including by Luis Pizarro (USEPA). Erich Weissbart (USEPA) confirmed his agreement with this approval.
- b. No further work is necessary to address RCRA corrective action related to the Institute site.

7. Corrective Measures Proposal (CMP)

- a. The CMP will be referred to as a Corrective Measures Study (CMS) moving forward.
- b. USEPA will review the corrective action permit to determine if a Final RFI submittal/approval required as condition of the existing permit; Per email from Erich Weissbart to Jerome Cibrik and Kylie McCord on 6/5/17, the Final RFI is a requirement.
- c. USEPA/WVDEP agreed that updating the Current Conditions Report (CCR) will be best way to consolidate investigation results since 2009 and that this document would meet the requirement for a Final RFI (if required by the permit). Per email referenced in item b, the updated CCR will satisfy the permit requirement for a Final RFI.
- d. USEPA/WVDEP indicated it is not necessary to call out all the alternatives and justifications for not selecting specific alternatives in the CMS. Other documents where screening was completed can be referenced to meet this requirement.
- e. EPA/WVDEP would like a simple summary of each SMWU and AOC and the work that has been completed to date; discussion provided in the 2009 CCR was generally acceptable. The descriptions will be updated as appropriate where additional work has been completed.
- f. USEPA suggested grouping similar remedies rather than evaluating based on exposure units and individual SWMUs (e.g., landfills/waste-in-place areas).
- g. Review Statement of Basis prepared for Potomac River site as good example of what USEPA/WVDEP are looking for in the CMS. Kenan Cetin (WVDEP) will provide a copy to CH2M for review.
- h. Work interactively with USEPA (e.g., send specific sections of the CMS for review) to ensure that CMS satisfies USEPA requirements/preferences.
- i. Consider decision logic for when to complete additional injection events for Soygold at Area 3 when preparing the Corrective Measures Implementation Plan (CMIP)